

**LOCAL BANKRUPTCY FORM 9013-4**

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

In Re:  
Timi S. Wills

Case Number: 1:19-bk-01821-HWV

Debtor(s)

Chapter: 13

U.S. Bank National Association, as Indenture  
Trustee on behalf of and with respect to Barclays  
Mortgage Trust 2021-NPL1, Mortgage-Backed  
Securities, Series 2021-NPL1

Movant

vs.

Timi S. Wills  
Debtor(s)

Ottie J. Olnick  
Co-Debtor  
Jack N Zaharopoulos  
Trustee

Defendant(s)/Respondent(s)

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance:

The Parties need additional time to attempt to reach an amicable resolution to this matter.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: June 27, 2025

/s/ Daniel P. Jones  
Applicant's Signature

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<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.